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ADMITTED: NEW YORK, EIGHTH CIRCUIT  
SECOND CIRCUIT, ALGERIAN BAR  
US COURT ON INTERNATIONAL TRADE

November 26, 2018

**VIA ECF**

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)**

Dear Judge Netburn:

On behalf of Defendants World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International (collectively referred to as “WAMY”), we write to provide the Court with a status update on WAMY’s re-production of previously redacted documents.

As the Court is aware, WAMY has produced over 1.2 million pages of documents. These productions have been on a rolling basis from 2012. A vast majority of the donation documents were produced with donor names redacted. On August 29, 2018, the Court Ordered WAMY to re-produce in un-redacted form all documents previously produced with redactions (DKT # 4130). The Court also Ordered WAMY to respond to Plaintiffs’ third and fourth document requests and further provide additional discovery documents.

Pursuant to the Court’s October 26, 2018 Order (DKT # 4230), on November 12, 2018, WAMY produced documents responsive to the Plaintiffs’ third and fourth documents requests. WAMY also produced missing meeting minutes from its governing bodies, boards and committees, missing annual reports and documents relating to its relationship with the Saudi government.

The October 26, 2018 Order (DKT # 4230) also granted WAMY’s request to re-produce the un-redacted documents by November 26, 2018 (DKT # 4230). Counsel for WAMY has a team exclusively focused on the redaction project. The team has been working around the clock including over the just-concluded Thanksgiving weekend in an effort to meet this deadline. Today, WAMY has produced 166,389 pages of un-redacted documents to Plaintiff. (A copy of WAMY’s letter to Plaintiffs is annexed herein as Exhibit 1). However, due to the overwhelming number of documents with redactions and the meticulousness required, there remains a portion which will be

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produced in two weeks to complete all un-redacted documents which were previously redacted. WAMY has gone through all its previous productions commencing from 2012 to 2018. Today, WAMY has produced all previously redacted documents from its 2012 through to half of its 2016 productions to Plaintiff.

The remaining portion constitutes half of WAMY's 2016 productions and its 2017 productions. WAMY respectfully requests an additional two weeks to complete re-production of the remaining documents, which will be on or before December 10, 2018.

Respectfully Submitted,

/s/ Omar Mohammedi

Omar Mohammedi, Esq.

/s/Fredrick Goetz

Frederick Goetz, Esq.

cc: All MDL Counsel of Record (via ECF)